SOUTHERN DISTRICT OF NEW YORK	V
JENNIFER SHARKEY,	: :
Plaintiff,	: Civil Action No.: 10-cv-3824 (RWS)
v.	
J.P. MORGAN CHASE & CO., JOE KENNEY, ADAM GREEN, and LESLIE LASSITER, in	: : :
their official and individual capacities,	:

Defendants.

UNITED STATES DISTRICT COURT

## **DECLARATION OF DOUGLAS H. WIGDOR**

- I, Douglas H. Wigdor, pursuant to 28 U.S.C. § 1746, declare and state as follows:
- 1. I am a Partner at the law firm Wigdor LLP, attorneys for Plaintiff Jennifer Sharkey ("Plaintiff") in the above-captioned action against Defendants J.P. Morgan Chase & Co. ("JPMC"), Joe Kenney, Adam Green and Leslie Lassiter (collectively, "Defendants"). I have personal knowledge of the facts set forth herein and submit this declaration in opposition to Defendants' Motions *In Limine*.
- 2. Attached hereto as **Exhibit A** is a true and correct copy of relevant excerpts from the transcript of the deposition of Jennifer Sharkey, taken October 16, 2012.
- 3. Attached hereto as **Exhibit B** is a true and correct copy of Plaintiff's Rule 26(A) Initial Disclosures, dated October 11, 2011.
- 4. Attached hereto as **Exhibit C** is a true and correct copy of correspondence from Michael D. Schissel, Esq. to The Honorable Robert W. Sweet, dated June 14, 2013.
- 5. Attached hereto as **Exhibit D** is a true and correct copy of correspondence from Lawrence M. Pearson, Esq. to The Honorable Robert W. Sweet, dated June 18, 2013.

- 6. Attached hereto as **Exhibit E** is a true and correct copy of correspondence from Michael D. Schissel, Esq. to The Honorable Robert W. Sweet, dated July 19, 2013.
- 7. Attached hereto as **Exhibit F** is a true and correct copy of relevant excerpts from the transcript of the deposition of Anne M. Marchetti, taken June 6, 2013.
- 8. Attached hereto as **Exhibit G** is a true and correct copy of Plaintiff's Proposed Trial Exhibit 205, Know Your Customer Approval Verify & Confirm for Client A.
- 9. Attached hereto as **Exhibit H** is a true and correct copy of Plaintiff's Proposed Trial Exhibit 206, email correspondence from Kathleen Gruszczyk to Veronica Bertrand dated November 1, 2010.
- 10. Attached hereto as **Exhibit I** is a true and correct copy of Plaintiff's Proposed Trial Exhibit 208, email correspondence from Kathleen Gruszczyk to James Dalessio dated January 31, 2011.
- 11. Attached hereto as **Exhibit J** is a true and correct copy of relevant excerpts from the transcript of the deposition of Kathleen Gruszczyk, taken February 8, 2013.
- 12.
  13.
  14.
- 15. Attached hereto as **Exhibit N** is a true and correct copy of Plaintiff's Proposed Trial Exhibit 210,

- 16. Attached hereto as **Exhibit O** is a true and correct copy of Plaintiff's Proposed Trial Exhibit 211,
- 17. Attached hereto as **Exhibit P** is a true and correct copy of Plaintiff's Proposed Trial Exhibit 222,
- 18. Attached hereto as **Exhibit Q** is a true and correct copy of Plaintiff's Declaration in Opposition to Defendants' Motion for Summary Judgment, dated September 23, 2013.
- 19. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: January 13, 2017 New York, New York

Douglas H. Wigdor

## **EXHIBITS A-Q FILED UNDER SEAL**